

Please consider the following regarding the original and amended proposed rule changes from the ARRL to the FCC and RM-11306.

It is time to remove the designations of “RTTY, data” and “Phone, image” from Part 97. The designations are no longer objective, are confusing, and are limiting to progress. One can send an “image” of a pecan tree by SSTV and be in one portion of the band. One can send an “image” of the same pecan tree as a .jpg file in another part of the band. They are both transmissions and are both image and data at the same time. It is also time to remove, or at least increase, the baud rate limitations on data within the amateur service to allow for growth and new more efficient modes.

All “data” or digital modes should be in the same area. This would include SSTV, RTTY, PSK, Tor modes and digital voice. All analog voice, SSB, AM, and FM, where allowed, transmissions should be in a separate area on each band.

Each band should have an area available for unattended digital communications. Long ago technology gave us the ability to communicate one to another without each person being on the same frequency and at the same time. Let us move past one on one communications throughout the amateur service. At least two to four times as much unattended bandwidth is needed on each band.

It would be reasonable to limit the “voice” bandwidths to 3 kHz. If you feel the desire to have 6, 12, or 15 kHz portions for higher fidelity, that is a choice, but in my opinion, would add nothing of benefit to the amateur service. The availability of 16 kHz for FM on HF frequencies higher than 29.0 MHz is also reasonable.

It may also be reasonable to divide the data portions of the bands into smaller segments. Perhaps a bandwidth of 100 Hz or less for narrow band modes such as PSK and CW, 500 Hz or less for RTTY, and several of the Tor modes, and 2.5 or 3.5 kHz for higher data rate modes such as Pactor III, would be useful. That would allow the narrow bandwidth modes to be unimpacted by other modes. The more traditional RTTY, Packet, Amtor, G-Tor, Pactor I, Pactor II, and others would have an area for keyboard to keyboard communications. The 2.5 or 3.5 kHz area would be available for Pactor III and other digital modes yet to be developed for higher data rates.

The 60 meter band as currently configured should remain unchanged. Adding CW or other data modes to a voice channel is only asking for problems.

The ARRL's comments below are not reasonable.

When deemed necessary by the FCC's Enforcement Bureau to assure compliance with the FCC Rules, a station must:

(1) Restrict transmissions of any digital code to the extent instructed; and

(2) Maintain a record, convertible to the original information, of all digital communications transmitted.

Certainly anything necessary for the FCC's Enforcement Bureau is appropriate. The comment "Restrict transmissions of any digital code to the extent instructed" makes little or no sense. The requirement to "Maintain a record, convertible to the original information, of all digital communications transmitted" would be no more practical than making a written record of everything one said on Single Side Band or FM or any other mode. Would one need a record of every CW contact during a DX contest, or RTTY contest, or every roundtable or net gathering? Those requirements are unreasonable, and in my opinion, do nothing to protect anyone and do nothing to advance the amateur service.

Thank you for your consideration.

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